

EXHIBIT A

YOUNG CONAWAY STARGATT & TAYLOR, LLP

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November 20, 2007

VIA FACSIMILE AND FIRST CLASS MAIL

James P. Hall, Esquire
Phillips Goldman & Spence, P.A.
1200 North Broom Street
Wilmington, DE 19806

Re: Riley v. DRBA, No. 05-746 (D. Del.)
Plaintiff's Discovery Responses

Dear Jim:

I have reviewed your responses to Defendants' First Set of Interrogatories and Document Requests, and they are deficient in several respects. Please respond completely to the following on or before December 3, 2007. I reserve the right to take additional depositions of Mr. Riley based on any additional responses provided after this date.

Interrogatory No. 8: Your response does not provide the total amount of damages claimed, nor does it itemize the amount of each element of damages claimed. Please provide a complete response.

Interrogatory No. 11: "Identify" is defined to include name, present address, and telephone number. Please provide this information for each physician listed.

Interrogatory No. 15: Please provide the information as requested in subsections (a) to (e).

Interrogatory No. 16: Does your response "not applicable" mean that Mr. Riley has not had any criminal convictions?

Interrogatory No. 18: Please provide all requested information on the two personal injury lawsuits, including names of parties and case caption.

Interrogatory No. 20: Response is incomplete. Please provide information requested in (a) through (e) for each and every paycheck you contend was discriminatory.

Document Request No. 1: In this response, as well as many others, you object "to the extent it is overly broad, etc," and then state "by way of further response" Does your "further response" fully respond to the question, or are you withholding some of the responsive documents based on your objection?

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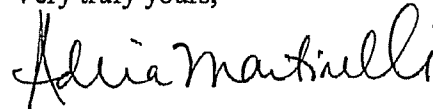
Document Request No. 8: Your response indicates that you have submitted medical authorizations to Plaintiff's treating physicians and that the records will be provided. We have not received any medical records. Please provide records immediately. As stated above, if we do not receive all records by December 3, 2007, we reserve the right to further depose Mr. Riley after receipt of these records.

Document Request No. 9: Your response indicates that Plaintiff's tax returns will be produced. We have not received any tax returns. Please provide these documents immediately. As stated above, if we do not receive all records by December 3, 2007, we reserve the right to further depose Mr. Riley after receipt of these records.

In addition, in your produced documents (labeled 1-84), the document beginning on 55 entitled "Position Description Questionnaire for Hourly Positions" appears to be missing a page. You will note that 55 appears to be page 1 of the document, and 56 skips to page 3. Please provide the missing page (page 2 of the Position Description Questionnaire).

We look forward to your complete responses to our outstanding discovery requests.

Very truly yours,



Adria B. Martinelli

ABM:fkf

cc: William W. Bowser, Esquire
Trudy Spence-Parker